

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

JAMES RYALS, JR., et al.,

Plaintiffs,

v.

HIRERIGHT SOLUTIONS, INC., et al.,

Defendants.

Case No. 3:09cv625

O'NEAL HENDERSON,

Plaintiff,

v.

HIRERIGHT SOLUTIONS, INC., f/k/a USIS
COMMERCIAL SERVICES, INC.,

Defendant.

Case No. 3:11cv558

BAHIR SMITH,

Plaintiff,

v.

HIRERIGHT SOLUTIONS, INC., f/k/a USIS
COMMERCIAL SERVICES, INC.,

Defendant.

Case No. 3:11cv505

CONSENT MOTION TO CONSOLIDATE

Plaintiffs move, with the consent of the defendants, that the above actions shall be consolidated for the purpose of administering the Class Action Settlements, with papers to be filed in 33:09cv625 under the style appearing above. The grounds for this motion are contained

in Memorandum in Support of Motion for Preliminary Approval of Settlement previously filed and Memorandum in Support of Motion to Consolidate filed contemporaneously herewith.

The proposed Order to which the Parties agree is attached hereto as Exhibit "A".

JAMES RYALS, JR., et al,

/s/

Leonard A. Bennett, Esq.

VS#37523

Attorney for Plaintiff

CONSUMER LITIGATION ASSOCIATES, P.C.

12515 Warwick Boulevard, Suite 100

Newport News, Virginia 23606

(757) 930-3660 - Telephone

(757) 930-3662 – Facsimile

lenbennett@cox.net

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Amy Rachel Davis
Williams & Connolly LLP
725 12th St NW
Washington, DC 20005
202-434-5000
Fax: 202-434-5029
Email: adavis@wc.com

Dane Hal Butswinkas
Williams & Connolly LLP
725 12th St NW
Washington, DC 20005
(202) 434-5000

Daniel Patrick Shanahan
Williams & Connolly LLP
725 12th St NW
Washington, DC 20005
(202) 434-5174
Fax: (202) 434-5029
Email: dshanahan@wc.com

Frank G Bowman
Williams & Connolly LLP
725 Twelfth Street, N.W.
Washington, DC 20005
202-434-5000
Fax: 202-434-5029
Email: fbowman@wc.com

_____/s/
Leonard A. Bennett, Esq.
VSB #37523
Attorney for Plaintiff
CONSUMER LITIGATION ASSOCIATES, P.C.
12515 Warwick Boulevard, Suite 100

Newport News, Virginia 23606
(757) 930-3660 - Telephone
(757) 930-3662 – Facsimile
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